REMARKS/ARGUMENTS

This amendment is submitted along with a request for a three month extension, a Request for Continued Examination, a Petition for Revival and appropriate fees in reply to the final Office Action dated September 16, 2005 and the Notice of Abandonment dated March 31, 2006. Claims 1-17 and 19-55 currently stand rejected and are the only claims pending in the present application. Independent claims 1, 36, 38, 41, 42 and 53 have been amended to more particularly distinguish the claimed invention from the cited references. No new matter has been added by the amendment.

The present application received the Notice of Abandonment for failure to respond to the final Office Action of September 16, 2005. However, Applicants respectfully submit that the delay in responding to the final Office Action was unavoidable due to the unexpected death of Applicant's agent listed at the correspondence address provided in connection with the present application. Accordingly, Applicants respectfully request revival of the present application in accordance with the Petition for Revival provided herewith.

In light of the amendment and the remarks presented below, Applicants respectfully request reconsideration and allowance of all now-pending claims of the present application.

Claim Rejections - 35 USC §103

Claims 1, 9, 10, 14-17, 22, 24, 25, 29, 35-45 and 53 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Raghunandan (U.S. Patent No. 6,775,689) in view of Wang et al. (U.S. Patent No. 6,822,663, hereinafter "Wang"). Claims 2-8 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Raghunandan in view of Wang and further in view of Moriya (U.S. Patent No. 6,161,140). Claims 11-13, 19-21, 23, 30-34, 46-52, 54 and 55 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Raghunandan in view of Wang and further in view of the article Wei-Ying Ma et al., *A Framework for Adaptive Content Delivery in Heterogeneous Network Environments*, presented at Multimedia Computing and Networking (MMCN00), San Jose, California, USA, 2000 (hereinafter "Ma"). Claims 26-28 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Raghunandan in view of Kanevsky (U.S. Patent No. 6,300,947).

Independent claim 1 has been amended to recite, *inter alia*, <u>analyzing the serial data of</u> <u>the electronic document by at least one transformation module to determine an order of</u> <u>presentation of the portions of the content different from the order defined by the serial data</u>.

Raghunandan discloses reordering content of an electronic document, namely, an email in the case of Raghunandan. Unlike the claimed invention, however, Raghunandan fails to teach or suggest the claimed invention including generating reorganization information for reordering portions of the document, where the different order is adapted based upon a performance capability of a display of a target device as claimed in the claimed invention. The final Office Action concedes that Raghunandan does not teach or suggest this feature of the claimed invention and therefore alleges that Wang discloses this feature.

Notwithstanding this analysis, with which Applicants respectfully disagree, Applicants have amended the independent claims to further patentably distinguish the claimed invention from the cited references. For example, in contrast to the claimed invention, neither Raghunandan nor Wang, taken individually or in combination, teach or suggest analyzing serial data representative of an electronic document. To the contrary, both Raghunandan and Wang analyze the electronic document itself. In this regard, Raghunandan discloses reordering content based on segments of content identified by segment identifiers supplied by the user. Wang, on the other hand, provides a graphic web page editor for presenting a source web page and enabling the user to graphically rearrange the web page, the web page editor also presenting a preview of a resulting web page after rearrangement by the user. Meanwhile, the claimed invention analyzes the serial data, such as serial data expressed in a markup language (e.g., HTML), to determine the different order of presentation of the electronic document represented thereby. More particularly, the claimed invention recites that one or more transformation modules analyze the serial data to determine the different order of presentation. Both Raghunandan and Wang, on the other hand, disclose that any difference in presentation of an email or electronic document is supplied by a user of the system, and is not based on any analysis by transformation modules. Thus, both Raghunandan and Wang are directed to content reordering of an electronic document based on user rearrangement following analysis of the

document itself while the claimed invention recites that the transformation modules analyze serial data representing the document in order to determine reordering of the content.

Accordingly, both Raghunandan and Wang, either individually or in combination, fail to teach or suggest <u>analyzing the serial data of the electronic document by at least one transformation module to determine an order of presentation of the portions of the content different from the order defined by the serial data</u> as claimed in independent claim 1. Applicants also submit that the additional references, namely Ma, Moriya and Kanevsky, each similarly fail to teach or suggest the feature above and are not cited as such. Accordingly independent claim 1 is patentable over the cited references taken either individually or in combination.

Applicants further submit that independent claims 36, 38, 41, 42 and 53 have also been amended to incorporate similar subject matter to that of independent claim 1 with respect to the feature described above. Accordingly, Applicants submit that the independent claims 36, 38, 41, 42 and 53 are patentable for at least those reasons given above for independent claim 1. Claims 2-17, 19-35, 37, 39, 40, 43-52, 54 and 55 each depend either directly or indirectly from corresponding ones of independent claims 1, 36, 38, 41, 42 and 53 and thus include all the recitations of their corresponding independent claims. Therefore, dependent claims 2-17, 19-35, 37, 39, 40, 43-52, 54 and 55 are patentable for at least those reasons given above for independent claims 1, 36, 38, 41, 42 and 53.

Accordingly, Applicants respectfully submit that the rejections of claims 1-17 and 19-55 are overcome.

Appl. No.: 09/851,404
Amdt. dated 05/31/2006
Reply to Office Action of September 16, 2005

<center>**CONCLUSION**</center>

In view of the amendments to the claims and the remarks presented above, Applicants respectfully submit that the present application is in condition for allowance. As such, the issuance of a Notice of Allowance is therefore respectfully requested. In order to expedite the examination of the present application, the Examiner is encouraged to contact Applicants' undersigned attorney in order to resolve any remaining issues.

It is not believed that extensions of time or fees for net addition of claims are required, beyond those that may otherwise be provided for in documents accompanying this paper. However, in the event that additional extensions of time are necessary to allow consideration of this paper, such extensions are hereby petitioned under 37 CFR § 1.136(a), and any fee required therefore (including fees for net addition of claims) is hereby authorized to be charged to Deposit Account No. 16-0605.

Respectfully submitted,

Chad L. Thorson
Registration No. 55,675

Customer No. 00826
ALSTON & BIRD LLP
Bank of America Plaza
101 South Tryon Street, Suite 4000
Charlotte, NC 28280-4000
Tel Charlotte Office (704) 444-1000
Fax Charlotte Office (704) 444-1111